

STATE OF MARYLAND

VS.

STEVEN R. KAUFFMAN

*** IN THE CIRCUIT COURT**

*** FOR BALTIMORE COUNTY**

*** CASE NO: C-03-CR-23-003775**

*** * * * ***

STATE'S DISCOVERY PURSUANT TO MARYLAND RULE 4-263

Now comes the State of Maryland by Scott D. Shellenberger, State's Attorney for Baltimore County and John Magee, Assistant State's Attorney for Baltimore County, and says the following:

**PURSUANT TO MARYLAND RULE 4-263(b)(1) AND 4-263(d), THIS
DISCOVERY IS BEING PROVIDED TO THE DEFENSE ATTORNEY
WITH THE UNDERSTANDING THAT PHYSICAL COPIES OF THE
MATERIALS ATTACHED HERETO WILL NOT BE PROVIDED TO THE
DEFENDANT.**

Several methods may be utilized to provide discovery items. Documents and small media will be made available through a secure-link from *Karpel Solutions*. Large media such as interview and surveillance video will be sent through a secure-link to the electronic file sharing service *ShareFile* (<https://baltimorecountymd.sharefile.com>). The media items placed on *ShareFile* will remain for 60 days from the date the discovery is provided by the State. After 60 days, the media items on *ShareFile* will be deleted. You may download or copy the items on *ShareFile* before they are deleted.

If a video has been sent in discovery, you may need to install software in order to view it. Many videos require proprietary software that this office is unable to provide. Free video players such as *VLC Media Player* (www.videolan.org) can be downloaded from the Internet.

**IF A DVD OR CD OF AN INTERVIEW HAS BEEN SENT IN
DISCOVERY, YOU MAY NEED TO DOWNLOAD FREE SOFTWARE IN
ORDER TO VIEW IT. THE DOWNLOAD IS AVAILABLE ON THE
INTERNET AT WWW.VIDEOLAN.ORG.**

1. If Body Camera Video exists in this case, it is being provided pursuant to Maryland Rule 4-263 to counsel, with the understanding that the video will not be disseminated to anyone absent that which is necessary for the proper and complete representation of the Defendant or by authorization of the Court. The recipient of the video is cautioned to remain mindful of the possible restrictions on disclosure of intercepted communications in Court and Judicial Proceedings

Article, Title 10.

2. All written and oral statements of the Defendant, and of any Co-Defendant, that relate to the offense charged, and all material and information, including documents and recordings, that relate to the acquisition of such statements are attached.

3. The prior criminal convictions, pending charges, and probationary status of the Defendant and of any Co-Defendant with the exception of juvenile proceedings are available at <http://casesearch.courts.state.md.us>

4. The name of each State's witness whom the State's Attorney intends to call to prove the State's case in chief or to rebut alibi testimony, together with all written statements of the person that relate to the offense charged are contained in the attached Discovery materials. Pursuant to Maryland Annotated Code Criminal

Procedure Article, Section 11-205 the addresses of the witnesses and victims have been withheld.

5. Evidence of other crimes, wrongs, or acts committed by the defendant that the State's Attorney intends to offer at a hearing or at trial pursuant to Rule 5-404(b), is attached.

6. Material or information in any form, whether or not admissible, that tends to exculpate the defendant or negate or mitigate the defendant's guilt or punishment as to the offense charged is attached.

7. Material or information, if known, whether or not admissible that tends to impeach a State's witness is attached.

8. If records have been obtained of a medical or psychiatric condition or addiction of a witness that may impair the witness' ability to testify truthfully or accurately, they are only available pursuant to Court order.

The Defendant should contact the State to see if the State has any such materials in its possession.

9. Relevant material or information regarding specific searches and seizures, eavesdropping and electronic surveillance including wiretaps as well as any pretrial identification of the defendant by a State's witness is attached. Written policies related to eyewitness identification of the Baltimore County Police Department are available at:

[\(https://resources.baltimorecountymd.gov/Documents/States_Attorney/WrittenPoliciesProceduresBCoPDEyewitnessID.pdf\)](https://resources.baltimorecountymd.gov/Documents/States_Attorney/WrittenPoliciesProceduresBCoPDEyewitnessID.pdf)

10. If during an investigation of child abuse, rape or sexual offense in the first, second or third degree, a child under the age of thirteen years was interviewed by a

social worker, physician or any other enumerated person, the State's Attorney intends to introduce the statement of the child pursuant to the **Criminal Procedure Article § 11-304 (c)**. These statements describe sexual abuse by the Defendant and are included in discovery.

11. The names of each expert consulted by the State's Attorney in connection with this action, the expert's name and address, the subject matter of the consultation, the substance of the expert's findings and opinions, and a summary of the grounds for each opinion, if available at this time, are attached. An expert is any witness who has formed an opinion or reached a conclusion. In addition, the substance of any oral report and conclusion by the expert, if available, is attached. Pending reports of an expert will be provided promptly after this office has received them.

Upon reasonable notification to this office, the Defendant or his counsel may inspect and copy all written reports or statements made in connection with the action by the expert, including the results of any physical or mental examination, scientific test, experiment, or comparison.

12. Upon reasonable notification to this office, the Defendant or his counsel may inspect, copy, and photograph all documents, computer-generated evidence as defined in Rule 2-504.3(a), recordings, photographs, or other tangible things that the State's Attorney intends to use at a hearing or at trial.

If this answer contains copies of any evidence which the State may use at trial it does not mean that all items have been provided. They are, however, available for inspection upon sufficient notification.

13. Upon reasonable notification to this office, the Defendant or his counsel may inspect, copy, and photograph all items obtained from or belonging to the Defendant, whether or not the State's Attorney intends to use the item at a hearing or at trial.

14. The State hereby notifies the Defendant of its intention to introduce at trial business records in accordance with Maryland Rule of Evidence 5-902. The records are available for inspection upon reasonable notice to this office.

15. The State intends to introduce evidence of a DNA profile, pursuant to Courts and Judicial Proceedings Article, Section 10-915 of the Maryland Annotated Code.

16. Upon request of the State, the Defendant shall: appear in a line-up for identification; speak for identification; be fingerprinted; pose for photographs not involving reenactment of a scene; try on articles of clothing; permit the taking of specimens of material under his fingernails; permit the taking from his body of samples of blood, hair and other material involving no unreasonable intrusion upon his person; provide specimens of his/her handwriting; and submit to reasonable physical or mental examinations.

17. This Notice is given pursuant to Maryland Rule 4-342(d), and is to inform you that the State intends to introduce statements of victim impact should the case result in a conviction.

18. Upon notice to the State, the Defendant may inspect the contents of the State's file in this case, excluding those items otherwise privileged by law.

19. The State reserves the right to amend and/or supplement this answer, upon reasonable notice to the Defendant or his Counsel before the trial, by supplying information not presently known to the State's Attorney's Office.

20. Pursuant to Maryland Rule 4-263(g)(i)(2), the State has not provided the mental impressions, trial strategy, personal beliefs, or other privileged attorney work product, nor has it disclosed the identity of a confidential informant, if any, unless the State's Attorney intends to call the informant as a State's witness.

21. The State witnesses may identify the Defendant or Co-Defendant in court.

Respectfully submitted,



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CERTIFICATE OF COMPLIANCE AND SERVICE

I HEREBY CERTIFY, that I have complied with Maryland Rule 1-322.1
and a copy of the State's Discovery Pursuant to Maryland Rule 4-263 was provided
this 14th day of September, 2023 to:

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